



**Federal Express 8748 5419 8269**

March 23, 2012

Ms. Ingrid H. Hopkins  
Water Protection Division (3WP42)  
US EPA – Region III  
1650 Arch Street  
Philadelphia, PA 19103-3029  
(215) 814-5437  
[hopkins.ingrid@epa.gov](mailto:hopkins.ingrid@epa.gov)

**RE: Benning Road Generating Station – NPDES Permit No. DC 0000094  
Metal Excursion – Outfall 013Q**

Dear Ms. Hopkins,

This letter is a follow-up to the March 21, 2012 telephone notification, made on behalf of Pepco Energy Services, Inc. by Mr. Bruce Krepley, Environmental Specialist, to report daily maximum copper, iron and zinc excursions from a grab storm water sample taken on February 29, 2012 from Outfall 013.

On March 16, 2012 Ms. Brinkerhoff received the laboratory analysis indicating daily maximum concentrations for copper, iron and zinc were exceeded. Mr. Krepley made the required telephone notification per NPDES permit condition VI.6 to the USEPA.

Lab and field results indicated the following:

Analyte	Units	Permit Limit Daily Max	Results
Copper	ug/L	13.44	23.0
Iron	ug/L	1000	1700
Zinc	ug/L	117.18	210.0

Investigation of the metals excursions included a review of historical metal concentrations to obtain baseline storm water sample data. Specifically, storm water sample data gathered during the previous NPDES permit period for the Benning Road Generating Station indicates that the February 29, 2012 values are comparative to historical values, i.e. typical metal concentrations found in storm water samples dating back several years are similar to those seen in recent analysis.

On July 19, 2010, the facility submitted to EPA a TMDL Implementation Plan, as required by NPDES permit condition VII.E. The TMDL Plan provided information on past, current, and planned activities at the facility to meet the required load reductions for the Anacostia River TMDLs for metals. EPA

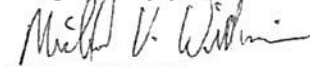
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approved the plan and the facility has begun the implementation process, including taking baseline storm water samples from various locations throughout the facility to locate potential hot spots and increased metal infiltration to storm water. These storm event results will then dictate which locations to use those best management practices listed in the plan to reduce the TMDL and consequently resolve any future metal excursions.

Please contact me at (703) 253-1787 or by electronic mail at [mwilliams@pepcoenergy.com](mailto:mwilliams@pepcoenergy.com) if you need additional information.

Respectfully yours,



Michael V. Williams  
Power Plant Asset Manager  
Pepco Energy Services, Inc.